

# EXHIBIT 3

# EXHIBIT B

### **SAMSUNG CONSTRUCTIONS**

#### **Samsung Defendants' Proposed Constructions of Disputed Claim Terms and Supporting Evidence**

The below chart includes Samsung's claim constructions, intrinsic evidence, and extrinsic evidence. Samsung reserves the right to rely on any evidence disclosed by Netlist in its chart of claim constructions, intrinsic evidence, and extrinsic evidence. Inclusion of evidence as extrinsic below, such as IPR proceedings, does not preclude the same evidence from being considered as intrinsic evidence.

#### '918 and '054 Patents

<b>Claim(s)</b>	<b>Terms for Construction</b>	<b>Samsung's Proposed Construction</b>
'918: 1-3, 5-7, 9-13, 15, 21	"a second plurality of address and control signals"	<p>"a second plurality of address and control signals that are distinct from a first plurality of address and control signals"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>'918 Patent at 4:45-51, 5:24-29, 7:5-11, 7:54-57, 9:8-13, 9:17-19, 12:3-23, 12:44-51, 13:29-56, 14:30-60, 14:61-15:9, 15:10-26, 15:27-49, 15:50-58, 16:12-32, 16:33-55, 16:56-17:13, 17:14-30, 17:59-18:17, 18:65-19:30, 21:14-22, 21:56-22:8, 23:28-40, 23:41-24:8, 24:35-59, 24:60-25:7, 25:8-31, 25:32-53, 26:36-65, 29:18-54, 32:58-33:13, Fig 8A, Fig. 8B, Fig. 10, Fig. 12, Fig. 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Claim 8</p> <p>2012-07-26 Specification of Patent App. 13/559,476 at Claim 13, Claim 20</p> <p>U.S. Patent 8,874,831 at Claim 7</p> <p>Provisional Patent App. 61/512,871, Appendix A at 7</p> <p>U.S. Patent 8,880,791 at Claim 2, Claim 19</p> <p>2013-05-29 Specification of Patent App. 13/905,053 at Claim 14, Claim 27</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>U.S. Patent 8,677,060 at Claim 14, Claim 27</p> <p>2016-01-19 Specification of Patent App. 15/000,834 at Claim 1</p> <p>2014-09-17 Specification of Patent App. 14/489,332 at Claim 1</p> <p>U.S. Patent 8,904,099 at Claim 1, Claim 2, Claim 16, Claim 17, Claim 31, Claim 32</p> <p>2013-05-29 Specification of Patent App. 13/905,048 at Claim 11, Claim 23, Claim 30</p> <p>U.S. Patent 8,671,243 at Claim 11, Claim 23, Claim 30</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>IPR2017-00692, Paper 1 (Petition) at 57-68</p> <p>IPR2017-00692, Paper 25 (FWD) at 32-36</p> <p>IPR2014-00994, Paper 7 (POPR) at 29-30, 34</p> <p>IPR2014-00994, Paper 8 (Institution Decision) at 7, 8-9, 11</p> <p>IPR2014-01370, Paper 8 (Petition) at 9-10</p> <p>IPR2014-01370, Paper 11 (POPR) at 41-43</p> <p>IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9</p> <p>IPR2017-00649, Paper 1 (Petition) at 7</p> <p>IPR2017-00649, Paper 7 (Institution Decision) at 3</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>IPR2022-00418, Paper 2 (Petition) at 7</p> <p>IPR2017-00730, Paper 1 (Petition) at 19-20</p> <p>IPR2017-00730, Paper 1 (Petition) at 28</p> <p>IPR2017-00730, Paper 6 (POPR) at 9-10</p> <p>IPR2022-00237, Paper 12 (POPR) at 29</p> <p>IPR2022-00996, Paper 1 (Petition) at 96</p> <p>2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14-15</p> <p>2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7-14</p> <p>2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11-13</p> <p>2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9-11</p> <p>Defendants may rely on testimony of Dr. David Liu and/or Dr. Paul Min to explain the technology, the state of the art at the time the application leading to the '918 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'918: 2, 17, 28	"dual buck converter" / "dual-buck converter"	<p>"buck converter with two outputs outputting two distinct regulated voltages"</p> <p><b><u>Intrinsic Evidence:</u></b></p>

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'054: 15		<p>'918 Patent at 29:18-54, Fig 16</p> <p>'054 Patent at 29:18-54, Fig 16</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>IPR2022-00996, Paper 1 (Petition) at 36-38</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '918 and '054 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'918: 16-22, 30	"pre-regulated input voltage" / "input voltage"	<p>"regulated voltage generated on the memory module from an input voltage"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>'918 Patent at Abstract, 24:35-59, 26:36-65, 28:3-19, 28:26-38, 28:39-58, 28:59-29:17, 29:18-54, 29:65-30:14, 30:15-25, Fig 16</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>IPR2022-00996, Paper 1 (Petition) at 73-75</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the application leading to the '918 patent was filed, the level of</p>

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		<p>ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'918: All asserted claims	"first" / "second" / "third" / "fourth" "regulated voltages"	<p>"first regulated voltage that is distinct from the second, third, and fourth regulated voltages" / "second regulated voltage that is distinct from the first, third, and fourth regulated voltages" / "third regulated voltage that is distinct from the first, second, and fourth regulated voltages" / "fourth regulated voltage that is distinct from the first, second, and third regulated voltages"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>'918 Patent at Abstract, 22:53-67, 23:41-24:8, 24:35-59, 25:8-31, 26:4-25, 26:36-65, 27:59-28:2, 28:3-19, 28:26-38, 28:59-29:17, 29:18-54, 29:65-30:14, 30:15-25, 30:35-49, Fig. 12, Fig 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Fig. 16, Fig 17, Claim 4, Claim 8, Claim 14</p> <p>2021-03-02 Office Action for Patent App. 17/138,766 at 3</p> <p>2021-03-11 Netlist Response to Office Action for Patent App. 17/138,766 at 2-11</p> <p>2021-11-19 Netlist Response to Office Action for Patent App. 17/328,019 at 2-12</p> <p>2008-06-02 Specification of Patent App. 12/131,873 at Claim 21, Claim 28, Claim 34, Claim 36</p> <p><b><u>Extrinsic Evidence:</u></b></p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>IPR2017-00692, Paper 1 (Petition) at 57-68</p> <p>IPR2017-00692, Paper 25 (FWD) at 32-36</p> <p>IPR2014-00994, Paper 7 (POPR) at 29-30, 34</p> <p>IPR2014-00994, Paper 8 (Institution Decision) at 7, 8-9, 11</p> <p>IPR2014-01370, Paper 8 (Petition) at 9-10</p> <p>IPR2014-01370, Paper 11 (POPR) at 41-43</p> <p>IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9</p> <p>IPR2017-00649, Paper 1 (Petition) at 7</p> <p>IPR2017-00649, Paper 7 (Institution Decision) at 3</p> <p>IPR2022-00418, Paper 2 (Petition) at 7</p> <p>2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14-15</p> <p>2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7-14</p> <p>2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11-13</p> <p>2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9-11</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the application leading to the '918 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of</p>

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		<p>ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'918: All asserted claims	"first" / "second" / "third" / "fourth" "voltage amplitude"	<p>"first voltage amplitude that is distinct from the second, third, and fourth voltage amplitudes" / "second voltage amplitude that is distinct from the first, third, and fourth voltage amplitudes" / "third voltage amplitude that is distinct from the first, second, and fourth voltage amplitude" / "fourth voltage amplitude that is distinct from the first, second, and third voltage amplitude"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>'918 Patent at Abstract, 22:53-67, 23:41-24:8, 24:35-59, 25:8-31, 26:4-25, 26:36-65, 27:59-28:2, 28:3-19, 28:26-38, 28:59-29:17, 29:18-54, 29:65-30:14, 30:15-25, 30:35-49, Fig. 12, Fig 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Fig. 16, Fig 17, Claim 4, Claim 8, Claim 14</p> <p>2021-03-02 Office Action for Patent App. 17/138,766 at 3</p> <p>2021-03-11 Netlist Response to Office Action for Patent App. 17/138,766 at 2-11</p> <p>2021-11-19 Netlist Response to Office Action for Patent App. 17/328,019 at 2-12</p> <p>2008-06-02 Specification of Patent App. 12/131,873 at Claim 21, Claim 28, Claim 34, Claim 36</p> <p><b><u>Extrinsic Evidence:</u></b></p>

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		<p>IPR2017-00692, Paper 1 (Petition) at 57-68</p> <p>IPR2017-00692, Paper 25 (FWD) at 32-36</p> <p>IPR2014-00994, Paper 7 (POPR) at 29-30, 34</p> <p>IPR2014-00994, Paper 8 (Institution Decision) at 7, 8-9, 11</p> <p>IPR2014-01370, Paper 8 (Petition) at 9-10</p> <p>IPR2014-01370, Paper 11 (POPR) at 41-43</p> <p>IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9</p> <p>IPR2017-00649, Paper 1 (Petition) at 7</p> <p>IPR2017-00649, Paper 7 (Institution Decision) at 3</p> <p>IPR2022-00418, Paper 2 (Petition) at 7</p> <p>2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14-15</p> <p>2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7-14</p> <p>2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11-13</p> <p>2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9-11</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the application leading to the '918 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of</p>

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		<p>ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'054: claims 1-15	"at least three regulated voltages"	<p>"at least three distinct regulated voltages"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>'054 Patent at Abstract, 22:53-67, 23:41-24:8, 24:35-59, 24:60-25:7, 25:8-31, 25:54-26:3, 26:4-25, 26:36-65, 27:59-28:2, 28:3-19, 28:26-38, 28:39-58, 28:59-29:17, 29:18-54, 29:65-30:14, 30:15-25, 30:35-49, Fig. 12, Fig 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Fig. 16, Fig 17, Claim 18, Claim 19, Claim 20, Claim 21, Claim 26, Claim 27, Claim 28</p> <p>2021-03-02 Office Action for Patent App. 17/138,766 at 3</p> <p>2021-11-19 Netlist Response to Office Action for Patent App. 17/328,019 at 2-12</p> <p>2008-06-02 Specification of Patent App. 12/131,873 at Claim 21, Claim 28, Claim 34, Claim 36</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>IPR2017-00692, Paper 1 (Petition) at 57-68</p> <p>IPR2017-00692, Paper 25 (FWD) at 32-36</p> <p>IPR2014-00994, Paper 7 (POPR) at 29-30, 34</p> <p>IPR2014-00994, Paper 8 (Institution Decision) at 7, 8-9, 11</p>

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		<p>IPR2014-01370, Paper 8 (Petition) at 9-10</p> <p>IPR2014-01370, Paper 11 (POPR) at 41-43</p> <p>IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9</p> <p>IPR2017-00649, Paper 1 (Petition) at 7</p> <p>IPR2017-00649, Paper 7 (Institution Decision) at 3</p> <p>IPR2022-00418, Paper 2 (Petition) at 7</p> <p>2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14-15</p> <p>2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7-14</p> <p>2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11-13</p> <p>2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9-11</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the application leading to the '054 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
'054: claims 16, 24 and dependent claims	"plurality of regulated voltages"	<p data-bbox="716 326 1226 358">"plurality of distinct regulated voltages"</p> <p data-bbox="716 394 974 427"><b><u>Intrinsic Evidence:</u></b></p> <p data-bbox="716 462 1881 602">'054 Patent at Abstract, 22:53-67, 23:41-24:8, 24:35-59, 24:60-25:7, 25:8-31, 25:54-26:3, 26:4-25, 26:36-65, 27:59-28:2, 28:3-19, 28:26-38, 28:39-58, 28:59-29:17, 29:18-54, 29:65-30:14, 30:15-25, 30:35-49, Fig. 12, Fig 13, Fig. 14, Fig. 15A, Fig. 15B, Fig. 15C, Fig. 16, Fig 17, Claim 18, Claim 19, Claim 20, Claim 21, Claim 26, Claim 27, Claim 28</p> <p data-bbox="716 638 1457 670">2021-03-02 Office Action for Patent App. 17/138,766 at 3</p> <p data-bbox="716 706 1755 738">2021-11-19 Netlist Response to Office Action for Patent App. 17/328,019 at 2-12</p> <p data-bbox="716 774 1814 839">2008-06-02 Specification of Patent App. 12/131,873 at Claim 21, Claim 28, Claim 34, Claim 36</p> <p data-bbox="716 875 980 907"><b><u>Extrinsic Evidence:</u></b></p> <p data-bbox="716 943 1272 976">IPR2017-00692, Paper 1 (Petition) at 57-68</p> <p data-bbox="716 1011 1262 1044">IPR2017-00692, Paper 25 (FWD) at 32-36</p> <p data-bbox="716 1079 1302 1112">IPR2014-00994, Paper 7 (POPR) at 29-30, 34</p> <p data-bbox="716 1148 1470 1180">IPR2014-00994, Paper 8 (Institution Decision) at 7, 8-9, 11</p> <p data-bbox="716 1216 1257 1248">IPR2014-01370, Paper 8 (Petition) at 9-10</p> <p data-bbox="716 1284 1268 1317">IPR2014-01370, Paper 11 (POPR) at 41-43</p> <p data-bbox="716 1352 1446 1385">IPR2014-01370, Paper 13 (Institution Decision) at 2, 6, 9</p>

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		<p>IPR2017-00649, Paper 1 (Petition) at 7</p> <p>IPR2017-00649, Paper 7 (Institution Decision) at 3</p> <p>IPR2022-00418, Paper 2 (Petition) at 7</p> <p>2011-10-18 Netlist Response to Office Action for Patent App. 12/240,916 at 14-15</p> <p>2012-05-24 Netlist Response to Office Action for Patent App. 12/240,916 at 7-14</p> <p>2017-11-06 Netlist Response to Office Action for Patent App. 14/840,865 at 11-13</p> <p>2020-03-12 Netlist Response to Office Action for Patent App. 15/934,416 at 9-11</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the application leading to the '054 patent was filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
All asserted claims	"A memory module"	<p>The preamble is non-limiting.</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>'918 Patent at Title, Abstract, 2:34-55, 3:46-52, 3:66-7:67, 12:52-63, 12:64-13:25, 21:14-23, 21:24-55, 22:53-67, 23:1-40, Fig. 5A, Fig. 5B, Fig. 12, Fig. 13, Fig. 14</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>'054 Patent at Title, Abstract, 2:34-55, 3:46-52, 3:66-7:67, 12:52-63, 12:64-13:25, 21:14-23, 21:24-55, 22:53-67, 23:1-40, Fig. 5A, Fig. 5B, Fig. 12, Fig. 13, Fig. 14</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>IPR2017-00692, Paper 1 (Petition) at 20, 49, 66</p> <p>IPR2017-00692, Paper 6 (POPR) at 20-21</p> <p>IPR2017-00692, Paper 7 (Institution Decision) at 10</p> <p>IPR2017-00692, Paper 12 (POPR) at 1-3, 13-41, 43-45</p> <p>IPR2017-00692, Paper 15 (Pet Reply) at 1-19</p> <p>IPR2017-00692, Paper 25 (FWD) at 9-14, 21, 25-26, 30</p> <p>IPR2022-00999, Paper 1 (Petition) at 19</p> <p>IPR2022-00996, Paper 1 (Petition) at 19</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '918 and '054 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>

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'060 and '160 Patents

Claim(s)	Terms for Construction	Samsung's Proposed Construction
'060: All asserted claims	"array die"	"array die that is different from a DRAM circuit"
'160: All asserted claims		<p><b><u>Intrinsic Evidence:</u></b></p> <p>'060 Patent at Abstract, 1:18-22, 1:30-56, 1:57-62, 1:63-2:7, 2:8-15, 2:10-38, 2:38-60, 2:61-3:16, 3:17-40, 4:17-21, 4:22-29, 4:30-35, 4:36-54, 4:55-5:11, 5:12-40, 5:41-45, 5:46-62, 5:63-6:8, 6:9-35, 6:36-47, 5:60-67, 7:9-21, 7:30-62, 7:63-8:18, 8:19-34, 8:35-62, 8:63-9:16, 9:17-27, 9:28-45, 9:46-60, 9:61-10:6, 10:18-34, 10:35-40, 10:41-55, 10:56-67, 11:1-5, 11:12-31, 11:32-40, 11:41-59, 11:66-12:15, 12:16-51, 12:52-13:5, 13:6-18, 13:19-34, 13:47-14:3, 14:4-21, 14:22-39, 14:47-15:3, 15:4-16, 15:17-25, 15:26-38, 15:39-47, 15:48-67, 16:1-10, 16:11-20, 16:21-28, 16:29-41, 16:42-55, 16:56-17:3, 17:4-23, 17:24-35, 17:37-49, 17:50-59, 17:60-18:3, 18:4-14, 18:38-56, 18:57-19:7, 19:8-20, 19:21-40, 19:41-63, 19:64-20:25, 20:26-34, 20:35-41, 21:32-38, 21:39-56, 21:57-63, 21:64-22:11, 22:12-21, 22:22-27, 22:34-57, Claims 1-10, 11-19, 20-28, 29-34, Fig. 1A, Fig. 1B, Fig. 2, Fig. 3, Fig. 4, Fig. 5, Fig. 6A, Fig. 6B, Fig. 7, Fig. 8</p> <p>'160 Patent at Abstract, 1:20-24, 1:32-58, 1:59-64, 1:65-2:9, 2:10-17, 2:10-38, 2:40-62, 2:63-3:18, 3:19-43, 4:20-24, 4:25-32, 4:33-38, 4:39-57, 4:58-5:14, 5:15-43, 5:44-48, 5:49-65, 5:66-6:11, 6:12-38, 6:39-50, 5:63-7:3, 7:12-24, 7:33-65, 7:66-8:21, 8:22-37, 8:38-65, 8:66-9:19, 9:20-30, 9:31-48, 9:49-63, 9:64-10:9, 10:21-37, 10:38-43, 10:44-58, 10:59-11:3, 11:4-8, 11:14-31, 11:32-39, 11:40-57, 11:63-12:12, 12:13-46, 12:47-67, 13:1-12, 13:12-26, 13:40-59, 13:60-14:20, 14:11-28, 14:36-59, 14:60-15:5, 15:6-15, 15:16-28, 15:29-37, 15:38-57, 15:58-67, 16:1-10, 16:11-18, 16:19-31, 16:32-45, 16:46-60, 16:61-17:13, 17:14-25, 17:26-39, 17:40-49, 17:50-60, 17:61-18:4, 18:26-44, 18:45-62, 18:63-19:8, 19:9-25, 19:26-48, 19:49-20:10, 20:11-19, 20:20-26, 21:17-23, 21:24-41, 21:43-48, 21:49-63, 21:64-22:6, 22:7-12, 22:19-43, Claims 1-10, 11-19, 20-28, 29-34, Fig. 1A, Fig. 1B, Fig. 2, Fig. 3, Fig. 4, Fig. 5, Fig. 6A, Fig. 6B, Fig. 7, Fig. 8</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>U.S. Patent Application Publication No. 2008/0025137 at Abstract, ¶¶ 1-54, 56-76, 78-86, 88, 89-92, 94-114, Claims 1-10, Fig. 1, Fig. 2A, Fig. 2B, Fig. 2C, Fig. 2D, Fig. 2E, Fig. 2F, Fig. 3, Fig. 4, Fig. 5, Fig. 6, Fig. 7, Fig. 8, Fig. 9A, Fig. 9B, Fig. 10, Fig. 11</p> <p>U.S. Patent Application Publication No. 2011/0193226 at ¶¶ 2, 3, 5-10, 12-19, 39-40, 45, 51</p> <p>U.S. Patent Application Publication No. 2006/0259678 at ¶ 44</p> <p>'060 Patent File History, 2013-06-06 Requirement for Restriction/Election at 1-5</p> <p>'060 Patent File History, 2013-08-06 Amendment and Response to Requirement for Restriction/Election at 1-11</p> <p>'060 Patent File History, 2013-10-11 Non-Final Office Action at 1-12</p> <p>'060 Patent File History, 2014-01-14 Amendment and Response to Non-Final Office Action at 1-15</p> <p>'160 Patent File History, 2015-01-22 Non-Final Office Action at 1-4</p> <p>'160 Patent File History, 2015-07-22 Amendment and Response to Non-Final Office Action at 1-7</p> <p>'160 Patent File History, 2015-10-22 Final Office Action at 1-6</p> <p>'160 Patent File History, 2016-01-07 Response to Final Office Action at 1-8</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>Dictionary of Computing, A&amp;C Black, Sixth Edition, at 20 (2010)</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>Wiley Electrical and Electronics Engineering Dictionary, IEEE Press, at 36 (2004)</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '060 and '160 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'060: 7	<p>"The memory package of claim 1, wherein a first number of array dies in the first group of array dies and a second number of at least one array die in the second group of at least one array die are selected in consideration of a load of the first die interconnect and a load of the second die interconnect so as to reduce a difference between a first load on the first data conduit and a second load on the second data conduit, the first load</p>	<p>Indefinite mixed method and apparatus</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>'060 Patent at Abstract, 1:18-22, 1:30-56, 1:57-62, 1:63-2:7, 2:19-38, 2:38-60, 2:61-3:16, 3:17-40, 3:44-4:3, 4:17-21, 4:22-29, 4:30-35, 4:36-54, 4:55-5:11, 5:41-45, 6:48-59, 6:60-67, 7:1-8, 7:9-21, 7:22-29, 7:30-62, 7:63-8:18, 8:19-34, 8:63-9:16, 9:17-27, 9:28-45, 9:46-60, 9:61-10:6, 10:7-17, 10:18-34, 10:35-40, 10:41-55, 10:56-67, 11:6-11, 11:12-31, 11:32-40, 11:41-59, 11:60-65, 11:66-12:15, 12:52-13:6, 13:7-18, 13:19-33, 13:34-47, 13:48-54, 13:55-14:3, 14:4-21, 14:22-39, 14:40-46, 14:47-15:3, 15:4-16, 15:17-25, 15:26-38, 15:39-47, 15:48-67, 16:1-10, 16:11-20, 16:21-28, 16:29-41, 16:42-55, 16:56-17:3, 17:4-23, 17:37-49, 17:50-59, 17:60-18:3, 18:4-14, 18:15-30, 18:38-57, 19:8-20, 19:64-20:25, 20:42-60, 20:61-21:9, 21:16-20, 21:21-31, 21:32-38, 21:64-22:11, 22:34-57, 22:59-23:10, 23:33-45, Claims 1-10, 11-19, 20-28, 29-34, Fig. 1A, Fig. 1B, Fig. 2, Fig. 3, Fig. 4, Fig. 5, Fig. 6A, Fig. 6B, Fig. 7, Fig. 8</p> <p><b><u>Extrinsic Evidence:</u></b></p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
	including a load of the first die interconnect, and a load of the first group of array dies, and the second load including a load of the second die interconnect and a load of the second group of at least one array die.”	<p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '060 and '160 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'060: 6, 11-14, 16-19, 20, 21, 23-28.	<p>“chip select signal” /</p> <p>“chip select conduits”</p>	<p>Plain and ordinary meaning</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>'060 Patent at Abstract, 1:18-22, 1:30-56, 1:57-62, 1:63-2:7, 2:19-38, 2:38-60, 2:61-3:16, 3:17-40, 3:44-4:3, 4:17-21, 4:22-29, 4:30-35, 4:36-54, 4:55-5:11, 5:41-45, 6:48-59, 6:60-67, 7:1-8, 7:9-21, 7:22-29, 7:30-62, 7:63-8:18, 8:19-34, 8:63-9:16, 9:17-27, 9:28-45, 9:46-60, 9:61-10:6, 10:7-17, 10:18-34, 10:35-40, 10:41-55, 10:56-67, 11:6-11, 11:12-31, 11:32-40, 11:41-59, 11:60-65, 11:66-12:15, 12:52-13:6, 13:7-18, 13:19-33, 13:34-47, 13:48-54, 13:55-14:3, 14:4-21, 14:22-39, 14:40-46, 14:47-15:3, 15:4-16, 15:17-25, 15:26-38, 15:39-47, 15:48-67, 16:1-10, 16:11-20, 16:21-28, 16:29-41, 16:42-55, 16:56-17:3, 17:4-23, 17:37-49, 17:50-59, 17:60-18:3, 18:4-14, 18:15-30, 18:38-57, 19:8-20, 19:64-20:25, 20:42-60, 20:61-21:9, 21:16-20, 21:21-31, 21:32-38, 21:64-22:11, 22:34-57, 22:59-23:10, 23:33-45, Claims 1-10, 11-19, 20-28, 29-34, Fig. 1A, Fig. 1B, Fig. 2, Fig. 3, Fig. 4, Fig. 5, Fig. 6A, Fig. 6B, Fig. 7, Fig. 8</p> <p>U.S. Patent No. 7,289,386 at 2:34-42, 3:17-30, 5:27-50, 6:18-38, 6:47-62, 6:63-7:5, 7:30-44, 7:45-62, 7:63-8:45, 8:46-64, 8:65-9:22, 11:44-12:12, 14:21-17:32, 17:33-19:59, 21:49-67, 23:1-14, 23:15-23, 23:24-34, 24:19-30, 24:57-25:10, 25:11-25, 25:26-44, 25:45-62, 25:63-26:19, 26:22-47, 27:21-46, 27:48-65, 27:66-28:18, 29:1-14, 30:32-38, 30:47-31:10,</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>31:11-24, 31:38-49, 32:18-33, 32:33-50, 33:4-16, Claims 1-13, Fig. 1A, Fig. 1B, Fig. 1C, Fig. 2A, Fig. 2B, Fig. 3A, Fig. 3B, Fig. 4A, Fig. 4B, Fig. 5, Fig. 6A, Fig. 6B, Fig. 6C, Fig. 6D, Fig. 6E, Fig. 7, Fig. 8, Fig. 9, Fig. 10, Fig. 11A, Fig. 11B, Fig. 12A, Fig. 12B, Fig. 13, Fig. 14</p> <p>U.S. Patent No. 7,532,537 at Claims 1-12, 13-17, 18-23, 24-34, 35-38, 39-44</p> <p>U.S. Patent No. 7,636,274 at Claims 1-27, 28-38, 39-55, 56-73, 74-83, 84-95, 96-97</p> <p>U.S. Patent No. 7,881,150 at Claims 1-14, 15-21, 22-30, 31-36</p> <p>U.S. Patent No. 7,619,912 at Claims 1-14, 15-27, 28-38, 39-51</p> <p>U.S. Patent No. 7,864,627 at Claims 1-12, 13-18, 19-20</p> <p>U.S. Patent No. 8,154,901 at Abstract, 1:57-2:10, 2:14-35, 2:36-61, 2:62-3:14, 3:15-32, 3:39-41, 4:30-45, 4:62-5:13, 5:59-67, 6:49-65, 7:11-57, 7:58-8:3, 8:4-21, 8:46-64, 12:38-39, 13:3-30, 13:47-14:14, 15:15-23, 15:24-48, Claims 1-3, 4-13, 14-18, 19-31, Fig. 1, Fig. 2, Fig. 3, Fig. 4, Fig. 5, Fig. 6, Fig. 7, Fig. 8, Fig. 9, Fig. 10</p> <p>U.S. Patent No. 8,001,434 at 6:58-7:20, 7:21-42, Claims 1-19, Fig. 1, Fig. 2, Fig. 3, Fig. 4, Fig. 5, Fig. 6</p> <p>U.S. Patent No. 8,417,870 at 1:50-57, 1:58-67, 2:19-45, 3:47-4:3, 4:40-44, 5:45-59, 5:60-6:3, 7:54-65, 7:66-8:17, 8:18-36, 9:5-36, 10:28-42, 10:43-57, Claims 1-15, 16-20, Fig. 1, Fig. 2, Fig. 3</p> <p>U.S. Patent No. 8,516,185 at Abstract, 1:47-54, 1:55-65, 2:21-54, 2:55-67, 3:66-4:9, 5:5-25, 7:61-8:31, 10:10-30, 11:12-57, 13:4-26, 13:27-54, 15:29-40, 15:41-59, 15:60-16:11,</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>16:46-17:8, 17:66-18:12, 18:13-27, Claims 1-12, 13-19, Fig. 1A, Fig. 1B, Fig. 2A, Fig. 2B, Fig. 2C, Fig. 2D, Fig. 3A, Fig. 3B, Fig. 3C, Fig. 3D, Fig. 4A, Fig. 4B, Fig. 5, Fig. 6</p> <p>U.S. Patent No. 8,033,836 at 2:20-33, 2:34-50, 2:51-59, 2:60-3:16, 3:17-36, 3:36-64, 3:65-4:25, 4:26-58, 5:4-8, 6:18-42, 6:66-7:9, 7:20-32, 7:41-52, 7:59-8:6, 8:50-9:3, 9:4-21, 10:5-18, 10:19-28, 12:36-54, 12:55-13:7, 13:37-51, 13:52-65, 14:17-36, 18:51-67, 19:1-14, Claims 1-7, 8-17, 18-19, Fig. Fig. 1A, Fig. 1B, Fig. 1C, Fig. 2, Fig. 3, Fig. 4, Fig. 5A, Fig. 5B, Fig. 5C, Fig. 6A, Fig. 6B, Fig. 6C, Fig. 7A, Fig. 7B, Fig. 8A, Fig. 8B, Fig. 8C, Fig. 9A, Fig. 9B, Fig. 9C, Fig. 10A, Fig. 10B, Fig. 10C, Fig. 11A, Fig. 11B, Fig. 11C, Fig. 12A, Fig. 12B, Fig. 12C, Fig. 13A, Fig. 13B, Fig. 13C, Fig. 13D, Fig. 14A, Fig. 14B, Fig. 15, Fig. 16</p> <p>'060 Patent File History, 2013-06-06 Requirement for Restriction/Election at 1-5</p> <p>'060 Patent File History, 2013-08-06 Amendment and Response to Requirement for Restriction/Election at 1-11</p> <p>'060 Patent File History, 2013-10-11 Non-Final Office Action at 1-12</p> <p>'060 Patent File History, 2014-01-14 Amendment and Response to Non-Final Office Action at 1-15</p> <p>U.S. Patent Application Publication No. 2008/0025137 at ¶¶ 57-69, Fig. 2A, Fig. 2B, Fig. 2C, Fig. 2D, Fig. 2E, Fig. 2F</p> <p>U.S. Patent Application Publication No. 2011/0193226 at ¶¶ 15-17</p> <p>U.S. Patent Application Publication No. 2006/0259678 at ¶¶ 25-28, 37-38, Fig. 3, Fig. 6, Fig. 7</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p><b><u>Extrinsic Evidence:</u></b></p> <p>Dictionary of Computing, A&amp;C Black, Sixth Edition, at 62 (2010)</p> <p>A Dictionary of Computing, Oxford University Press, Sixth Edition, at 466 (2008)</p> <p>Electronics Dictionary: Definitions for the Digital Age, Collins, Third Edition, at 68 (2007)</p> <p>The Cambridge Aerospace Dictionary, Cambridge University Press, Second Edition, at 615-16 (2009)</p> <p>Dictionary of Energy, Elsevier, at 459 (2009); Wiley Electrical and Electronics Engineering Dictionary, IEEE Press, at 707 (2004)</p> <p>Comprehensive Dictionary of Electrical Engineering, CRC Press, Second Edition, at 626-27 (2005)</p> <p>Dictionary of Science and Technology, A&amp;C Black, Second Edition, at 555 (2007)</p> <p>Webster's New World Telecom Dictionary, Wiley Publishing, Inc., at 438 (2008)</p> <p>Dictionary of Science and Technology, Chambers, at 1093 (2007)</p> <p>Telecom Dictionary, Althos Publishing, at 493 (2007)</p> <p>Newton's Telecom Dictionary, Flatiron Publishing, 26th Edition, at 1042 (2011)</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '060 and '160 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>

#### '506 Patent

Claim(s)	Terms for Construction	Samsung's Proposed Construction
'506: 1-3, 11, 15, 16	"one or more previous operations" <sup>1</sup>	<p>"one or more previous memory operations"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,860,506 at Abstract; Figs. 1-19; 2:28-36, 3:4-6, 3:25-50, 4:9-19, 4:65-5:10, 5:11-26, 5:43-57, 5:58-6:3, 7:44-8:8, 8:22-55, 8:56-9:26, 10:7-21, 15:17-26, 15:27-50, 15:51-65, 15:66-16:9, 16:10-24, 16:25-18:5, 18:6-28, 18:29-40, 18:41-48, 18:49-64; claims 1-20</p> <p>U.S. Patent No. 10,860,506 File History, 2019-04-22 Application, 2020-01-10 Non-Final Rejection, 2020-04-10 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-07-23 Notice of Allowance, 2020-10-16 Amendment After Notice of Allowance</p> <p>IPR2022-00711, Paper 7 (POPR) at 8-9, 73-76</p>

<sup>1</sup> Samsung and Netlist agree that the construction of this term should be: "one or more previous memory operations." Samsung believes that "one or more previous memory operations" should be given its plain and ordinary meaning.

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>U.S. Patent No. 8,001,434 at Figs. 3-6, 1:27-35, 1:36-57, 6:58-7:20, 9:34-53, 9:54-10:26, 13:30-56, 13:57-14:9; claims 1-35</p> <p>U.S. Patent No. 8,756,364 at Figs. 1-5, 12; Table 1, Table 2; 2:44-51, 7:1-9:18, 25:30-26:12, 29:15-28; claims 1-32</p> <p>U.S. Patent No. 8,516,188 at Figs. 1-14; Table 1, Table 2; 2:51-59, 7:37-59, 14:61-15:7, 16:46-18:63, 34:5-20, 37:33-46; claims 1-20</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>IPR2017-00730, Paper 6 (POPR) at 10-13, 21-22, 28</p> <p>IPR2022-00236, Paper 12 (POPR) at 4, 7, 13-24</p> <p>IPR2022-00236, Paper 16 (Institution Decision) at 24</p> <p>IPR2022-0237, Paper 12 (POPR) at 6-8</p> <p>U.S. Patent No. 9,128,632, File History, 2014-12-31 Amendment and Request for Reconsideration After Non-Final Rejection at 10</p> <p>U.S. Patent No. 9,824,035, File History, 2017-09-21 Notice of Allowance at 3</p> <p>U.S. Patent No. 10,268,608, File History, 2018-01-25 Office Action at 11</p> <p>U.S. Patent No. 10,268,608, File History, 2018-05-24 Amendment and Request for Reconsideration After Non-Final Rejection at 3</p> <p>U.S. Patent No. 10,268,608, File History, 2018-11-19 Notice of Allowance at 3</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'506: 14	"before receiving the input C/A signals corresponding to the memory read operation" <sup>2</sup>	<p>"during one or more previous memory operations"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,860,506 at Abstract; Figs. 1-19; 2:28-36, 3:4-6, 3:25-50, 4:9-19, 4:65-5:10, 5:11-26, 5:43-57, 5:58-6:3, 7:44-8:8, 8:22-55, 8:56-9:26, 10:7-21, 15:17-26, 15:27-50, 15:51-65, 15:66-16:9, 16:10-24, 16:25-18:5, 18:6-28, 18:29-40, 18:41-48, 18:49-64; claims 1-20</p> <p>U.S. Patent No. 10,860,506 File History, 2019-04-22 Application, 2020-01-10 Non-Final Rejection, 2020-04-10 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-07-23 Notice of Allowance, 2020-10-16 Amendment After Notice of Allowance</p>

<sup>2</sup> Samsung does not believe that the additional phrase "determining the first predetermined amount based at least on signals received by the first data buffer," which Netlist has added to this term, needs to be construed. If Netlist insists on including this phrase in the term being construed, the construction of the combined term should be: "determining the first predetermined amount based at least on signals received by the first data buffer during one or more previous memory operations."

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>IPR2022-00711, Paper 7 (POPR) at 8-9, 73-76</p> <p>U.S. Patent No. 8,001,434 at Figs. 3-6, 1:27-35, 1:36-57, 6:58-7:20, 9:34-53, 9:54-10:26, 13:30-56, 13:57-14:9; claims 1-35</p> <p>U.S. Patent No. 8,756,364 at Figs. 1-5, 12; Table 1, Table 2; 2:44-51, 7:1-9:18, 25:30-26:12, 29:15-28; claims 1-32</p> <p>U.S. Patent No. 8,516,188 at Figs. 1-14; Table 1, Table 2; 2:51-59, 7:37-59, 14:61-15:7, 16:46-18:63, 34:5-20, 37:33-46; claims 1-20</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>IPR2017-00730, Paper 6 (POPR) at 10-13, 21-22, 28</p> <p>IPR2022-00236, Paper 12 (POPR) at 4, 7, 13-24</p> <p>IPR2022-00236, Paper 16 (Institution Decision) at 24</p> <p>IPR2022-0237, Paper 12 (POPR) at 6-8</p> <p>U.S. Patent No. 9,128,632, File History, 2014-12-31 Amendment and Request for Reconsideration After Non-Final Rejection at 10</p> <p>U.S. Patent No. 9,824,035, File History, 2017-09-21 Notice of Allowance at 3</p> <p>U.S. Patent No. 10,268,608, File History, 2018-01-25 Office Action at 11</p> <p>U.S. Patent No. 10,268,608, File History, 2018-05-24 Amendment and Request for Reconsideration After Non-Final Rejection at 3</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>U.S. Patent No. 10,268,608, File History, 2018-11-19 Notice of Allowance at 3</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>

'339 Patent

Claim(s)	Terms for Construction	Samsung's Proposed Construction
'339: 1	"each respective byte-wise buffer further includes logic configurable to control the byte-wise data path in response to the module control signals"	<p>"each respective byte-wise buffer further includes logic configurable to, in response to the module control signals, activate the byte-wise data path connected to a first DDR DRAM device (in a first N-bit-wide rank), and disable the byte-wise data path connected to a second DDR DRAM device (in a second N-bit-wide rank), to cause a respective byte-wise section of the N-bit wide write data to be sent from the first side to the first DDR DRAM device along the activated byte-wise data path and not sent to the second DDR DRAM device along the disabled byte-wise data path"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4:8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65</p>

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		<p>U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>U.S. Patent No. 8,516,185, File History, 2012-06-21 Amendment and Request for Reconsideration after Non-Final Rejection at 7-9</p> <p>U.S. Patent No. 8,516,185, File History, 2012-09-13 Office Action at 4-5, 11-13</p> <p>U.S. Patent No. 8,516,185, File History, 2013-03-13 Amendment and Request for Reconsideration after Non-Final Rejection at 10-13</p> <p>U.S. Patent No. 8,516,185, File History, 2013-07-11 Notice of Allowance at 2-4</p> <p>U.S. Patent No. 8,417,870, File History, 2013-02-02 Notice of Allowance at 7-9</p> <p>U.S. Patent No. 9,606,907, File History, 2015-11-23 Office Action at 5-6</p> <p>U.S. Patent No. 9,606,907, File History, 2016-10-06 Office Action at 2-5, 7</p> <p>U.S. Patent No. 9,606,907, File History, 2016-11-03 Amendment at 29-34</p>

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		<p>U.S. Patent No. 9,606,907, File History, 2017-02-23 Corrected Notice of Allowability at 2-3</p> <p>IPR2014-01029, Paper 10 (POPR) at 4-6</p> <p>IPR2014-01029, Paper 11 (Institution Decision) at 2-3</p> <p>IPR2014-01369, Paper 11 (POPR) at 5-6, 19, 35-41.</p> <p>IPR2014-01369, Paper 12 (Institution Decision) at 2-4, 6-8</p> <p>IPR2017-00577, Paper 6 (POPR) at 2-6, 9-11, 13-17, 18-47, 50-65</p> <p>IPR2017-00577, Paper 8 (Institution Decision) at 3-4, 9-10</p> <p>IPR2017-00577, Paper 26 (Final Written Decision) at 3-4, 14-16</p> <p><i>Netlist, Inc v. Smart Modular Technologies, Inc.</i>, No. 4:13-cv-05889-YGR, Dkt. No. 253 at 11-12, 15-16 (N.D. Cal. Aug. 27, 2014)</p> <p><i>Netlist, Inc. v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 117, Exhibit A at 8-14, 20-40 (C.D. Cal. May 19, 2017)</p> <p><i>Netlist, Inc. v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 124 at 6-11 (C.D. Cal. May 26, 2017)</p> <p><i>Netlist, Inc. v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 143 at 2-9 (C.D. Cal. June 30, 2017)</p>

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		<p><i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Nov. 14, 2017 Initial Determination at 116-121 (USITC filed Sept. 1, 2016)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Jan. 16, 2018 Commission Review at 1-2 (USITC filed Sept. 1, 2016)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Nov. 22, 2019 Complainant Netlist, Inc.'s Omnibus Response to Respondents' and Staff's Petitions for Review at 29-33 (USITC filed Oct. 31, 2017)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Apr. 21, 2020 Commission Opinion at 7-13 (USITC filed Oct. 31, 2017)</p> <p>Collins English Dictionary, Seventh Edition, at 16 (2005)</p> <p>The New Oxford American Dictionary, Second Edition, at 15-16 (2005)</p> <p>Newton's Telecom Dictionary, 24th Edition, at 180-81, 263 (2008)</p> <p>McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition, at 294 (2003)</p> <p>Dictionary of Computing, Fifth Edition, at 92, 94 (2004)</p> <p>Wiley Electrical and Electronics Engineering Dictionary, at 212, 256 (2004)</p> <p>A Dictionary of Computing, Fifth Edition, at 179 (2004)</p>

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		<p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 1	“wherein the byte-wise data path is enabled for a first time period in accordance with a latency parameter to actively drive a respective byte-wise section of the N-bit wide write data associated with the memory operation from the first side to the second side during the first time period” <sup>3</sup>	<p>“wherein the byte-wise data path connected to a first DDR DRAM device (in a first N-bit-wide rank) is activated, and the byte-wise data path connected to a second DDR DRAM device (in a second N-bit-wide rank) is disabled, to cause a respective byte-wise section of the N-bit wide write data associated with the memory operation to be sent from the first side to the first DDR DRAM device along the activated byte-wise data path and not sent to the second DDR DRAM device along the disabled byte-wise data path during the first time period in accordance with a latency parameter”</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4:8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53,</p>

<sup>3</sup> Samsung agreed to include the word “wherein” as part of this term, as proposed by Netlist. Given this addition, the previous term (“each respective byte-wise buffer further includes logic configurable to control the byte-wise data path in response to the module control signals”) and this term should be combined into a single term and construed as: “each respective byte-wise buffer further includes logic configurable to, in response to the module control signals, activate the byte-wise data path connected to a first DDR DRAM device (in a first N-bit-wide rank), and disable the byte-wise data path connected to a second DDR DRAM device (in a second N-bit-wide rank), to cause a respective byte-wise section of the N-bit wide write data associated with the memory operation to be sent from the first side to

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		<p>13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65</p> <p>U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44</p>

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the first DDR DRAM device along the activated byte-wise data path and not sent to the second DDR DRAM device along the disabled byte-wise data path during the first time period in accordance with a latency parameter.”

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'339: 1	"logic in response to the module control signals is	"logic in response to the module control signals is configured to enable the first tristate buffers to activate the byte-wise data path connected to a first DDR DRAM device (in a

Claim(s)	Terms for Construction	Samsung's Proposed Construction
	configured to enable the first tristate buffers to drive the respective byte-wise section of the N-bit wide write data to the respective module data lines during the first time period”	<p>first N-bit-wide rank) and disable the byte-wise data path connected to a second DDR DRAM device (in a second N-bit-wide rank), to cause the respective byte-wise section of the N-bit wide write data to be sent from the first side to the module data lines coupled to the first DDR DRAM device along the activated byte-wise data path and not sent to the module data lines coupled to the second DDR DRAM device along the disabled byte-wise data path during the first time period”</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4:8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65</p> <p>U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p>

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		<p>person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 11	<p>"each respective data transmission circuit is configurable to enable the data paths for a first time period in accordance with a latency parameter to actively drive a respective section of the N-bit wide write data associated with the memory operation from the first side to the second side during the first time period"</p>	<p>"each respective data transmission circuit is configurable to, during the first time period in accordance with a latency parameter, activate the data paths connected to a first respective pair of DDR DRAM devices (in a first N-bit-wide rank), and disable the data paths connected to another respective pair of DDR DRAM devices (in another N-bit-wide rank), to cause a respective section of the N-bit wide write data associated with the memory operation to be sent from the first side to the first respective pair of DDR DRAM devices along the activated data paths and not sent to the other respective pair of DDR DRAM devices along the disabled data paths"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4:8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65</p> <p>U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>U.S. Patent No. 8,516,185, File History, 2012-06-21 Amendment and Request for Reconsideration after Non-Final Rejection at 7-9</p> <p>U.S. Patent No. 8,516,185, File History, 2012-09-13 Office Action at 4-5, 11-13</p> <p>U.S. Patent No. 8,516,185, File History, 2013-03-13 Amendment and Request for Reconsideration after Non-Final Rejection at 10-13</p> <p>U.S. Patent No. 8,516,185, File History, 2013-07-11 Notice of Allowance at 2-4</p> <p>U.S. Patent No. 8,417,870, File History, 2013-02-02 Notice of Allowance at 7-9</p> <p>U.S. Patent No. 9,606,907, File History, 2015-11-23 Office Action at 5-6</p>

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		<p>U.S. Patent No. 9,606,907, File History, 2016-10-06 Office Action at 2-5, 7</p> <p>U.S. Patent No. 9,606,907, File History, 2016-11-03 Amendment at 29-34</p> <p>U.S. Patent No. 9,606,907, File History, 2017-02-23 Corrected Notice of Allowability at 2-3</p> <p>IPR2014-01029, Paper 10 (POPR) at 4-6</p> <p>IPR2014-01029, Paper 11 (Institution Decision) at 2-3</p> <p>IPR2014-01369, Paper 11 (POPR) at 5-6, 19, 35-41.</p> <p>IPR2014-01369, Paper 12 (Institution Decision) at 2-4, 6-8</p> <p>IPR2017-00577, Paper 6 (POPR) at 2-6, 9-11, 13-17, 18-47, 50-65</p> <p>IPR2017-00577, Paper 8 (Institution Decision) at 3-4, 9-10</p> <p>IPR2017-00577, Paper 26 (Final Written Decision) at 3-4, 14-16</p> <p><i>Netlist, Inc v. Smart Modular Technologies, Inc.</i>, No. 4:13-cv-05889-YGR, Dkt. No. 253 at 11-12, 15-16 (N.D. Cal. Aug. 27, 2014)</p> <p><i>Netlist, Inc, v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 117, Exhibit A at 8-14, 20-40 (C.D. Cal. May 19, 2017)</p> <p><i>Netlist, Inc, v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 124 at 6-11 (C.D. Cal. May 26, 2017)</p>

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		<p><i>Netlist, Inc. v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 143 at 2-9 (C.D. Cal. June 30, 2017)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Nov. 14, 2017 Initial Determination at 116-121 (USITC filed Sept. 1, 2016)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Jan. 16, 2018 Commission Review at 1-2 (USITC filed Sept. 1, 2016)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Nov. 22, 2019 Complainant Netlist, Inc.'s Omnibus Response to Respondents' and Staff's Petitions for Review at 29-33 (USITC filed Oct. 31, 2017)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Apr. 21, 2020 Commission Opinion at 7-13 (USITC filed Oct. 31, 2017)</p> <p>Collins English Dictionary, Seventh Edition, at 16 (2005)</p> <p>The New Oxford American Dictionary, Second Edition, at 15-16 (2005)</p> <p>Newton's Telecom Dictionary, 24th Edition, at 180-81, 263 (2008)</p> <p>McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition, at 294 (2003)</p> <p>Dictionary of Computing, Fifth Edition, at 92, 94 (2004)</p> <p>Wiley Electrical and Electronics Engineering Dictionary, at 212, 256 (2004)</p>

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		<p>A Dictionary of Computing, Fifth Edition, at 179 (2004)</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 11	<p>"the respective data transmission circuit in response to the module control signals is configured to enable a first subset of the first tristate buffers to drive the first subsection of the respective section of the N-bit wide write data to a first subset of the respective module data lines coupled to a first one of the respective pair of DDR DRAM devices in each of at least some of the multiple N-bit-wide ranks, and to enable a second subset of the first tristate</p>	<p>"the respective data transmission circuit, in response to the module control signals, is configured to enable a first subset and a second subset of the first tristate buffers to activate the data paths connected to a first respective pair of DDR DRAM devices (in a first N-bit-wide rank), and disable the data paths connected to another respective pair of DDR DRAM devices (in another N-bit-wide rank), to cause the first subsection of the respective section of the N-bit wide write data to be sent from the first side to a first subset of the respective module data lines coupled to a first one of the first respective pair of DDR DRAM devices along one of the activated data paths, and a second subsection of the respective section of the N-bit wide write data to be sent to a second subset of the respective module data lines coupled to a second one of the first respective pair of DDR DRAM devices along another one of the activated data paths, and the respective section of the N-bit wide write data to not be sent to the other respective pair of DDR DRAM devices along the disabled data paths"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4-8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53,</p>

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	buffers to drive a second subsection of the respective section of the N-bit wide write data to a second subset of the respective module data lines coupled to a second one of the respective pair of DDR DRAM devices in each of at least some of the multiple N-bit-wide ranks"	<p>13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65</p> <p>U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>U.S. Patent No. 8,516,185, File History, 2012-06-21 Amendment and Request for Reconsideration after Non-Final Rejection at 7-9</p>

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		<p>U.S. Patent No. 8,516,185, File History, 2012-09-13 Office Action at 4-5, 11-13</p> <p>U.S. Patent No. 8,516,185, File History, 2013-03-13 Amendment and Request for Reconsideration after Non-Final Rejection at 10-13</p> <p>U.S. Patent No. 8,516,185, File History, 2013-07-11 Notice of Allowance at 2-4</p> <p>U.S. Patent No. 8,417,870, File History, 2013-02-02 Notice of Allowance at 7-9</p> <p>U.S. Patent No. 9,606,907, File History, 2015-11-23 Office Action at 5-6</p> <p>U.S. Patent No. 9,606,907, File History, 2016-10-06 Office Action at 2-5, 7</p> <p>U.S. Patent No. 9,606,907, File History, 2016-11-03 Amendment at 29-34</p> <p>U.S. Patent No. 9,606,907, File History, 2017-02-23 Corrected Notice of Allowability at 2-3</p> <p>IPR2014-01029, Paper 10 (POPR) at 4-6</p> <p>IPR2014-01029, Paper 11 (Institution Decision) at 2-3</p> <p>IPR2014-01369, Paper 11 (POPR) at 5-6, 19, 35-41.</p> <p>IPR2014-01369, Paper 12 (Institution Decision) at 2-4, 6-8</p> <p>IPR2017-00577, Paper 6 (POPR) at 2-6, 9-11, 13-17, 18-47, 50-65</p> <p>IPR2017-00577, Paper 8 (Institution Decision) at 3-4, 9-10</p>

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		<p>IPR2017-00577, Paper 26 (Final Written Decision) at 3-4, 14-16</p> <p><i>Netlist, Inc v. Smart Modular Technologies, Inc.</i>, No. 4:13-cv-05889-YGR, Dkt. No. 253 at 11-12, 15-16 (N.D. Cal. Aug. 27, 2014)</p> <p><i>Netlist, Inc, v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 117, Exhibit A at 8-14, 20-40 (C.D. Cal. May 19, 2017)</p> <p><i>Netlist, Inc, v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 124 at 6-11 (C.D. Cal. May 26, 2017)</p> <p><i>Netlist, Inc, v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 143 at 2-9 (C.D. Cal. June 30, 2017)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Nov. 14, 2017 Initial Determination at 116-121 (USITC filed Sept. 1, 2016)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Jan. 16, 2018 Commission Review at 1-2 (USITC filed Sept. 1, 2016)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Nov. 22, 2019 Complainant Netlist, Inc.'s Omnibus Response to Respondents' and Staff's Petitions for Review at 29-33 (USITC filed Oct. 31, 2017)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Apr. 21, 2020 Commission Opinion at 7-13 (USITC filed Oct. 31, 2017)</p> <p>Collins English Dictionary, Seventh Edition, at 16 (2005)</p>

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		<p>The New Oxford American Dictionary, Second Edition, at 15-16 (2005)</p> <p>Newton's Telecom Dictionary, 24th Edition, at 180-81, 263 (2008)</p> <p>McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition, at 294 (2003)</p> <p>Dictionary of Computing, Fifth Edition, at 92, 94 (2004)</p> <p>Wiley Electrical and Electronics Engineering Dictionary, at 212, 256 (2004)</p> <p>A Dictionary of Computing, Fifth Edition, at 179 (2004)</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 19	"each respective buffer further includes logic configurable to enable the data paths for a first time period to actively drive a respective section of the first N-bit wide data	"each respective buffer further includes logic configurable to, during a first time period, activate the data path connected to a first DDR DRAM device (in a first N-bit-wide rank), and disable the data path connected to a second DDR DRAM device (in a second N-bit-wide rank), to cause a respective section of the first N-bit wide data associated with the first memory operation to be sent from the first DDR DRAM device to the first side along the activated data path and not sent from the second DDR DRAM device along the disabled data path, and further configurable to, during a second time period subsequent to

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	<p>associated with the first memory operation from the second side to the first side during the first time period, and to enable the data paths for a second time period subsequent to the first time period to actively drive a respective section of the second N-bit wide data associated with the second memory operation from the second side to the first side during the second time period”</p>	<p>the first time period, activate the data path connected to the second DDR DRAM device and disable the data path connected to the first DDR DRAM device, to cause a respective section of the second N-bit wide data associated with the second memory operation to be sent from the second DDR DRAM device to the first side along the activated data path and not sent from the first DDR DRAM device along the disabled data path.”</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4:8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65</p> <p>U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p>

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Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 27	<p>"each respective n-bit-wide data buffer includes ... a first set of tristate buffers configurable to drive the respective n-bit section of the write data to the respective module data lines, ... a second set of tristate buffers configurable to drive the respective n-bit section of the read data to the respective set of data signal lines, and logic configurable to control at least the first set of tristate buffers and the second set of tristate buffers"</p>	<p>"each respective n-bit-wide data buffer includes logic configurable to enable a first set of tristate buffers to activate a data path connected to one DDR DRAM device (in a rank), and disable a data path connected to a different DDR DRAM device (in a different rank), to cause the respective n-bit section of the write data to be sent from the data signal lines to the module data lines coupled to the DDR DRAM device along the activated data path and not sent to the different DDR DRAM device along the disabled data path, and further configurable to enable a second set of tristate buffers to activate a data path connected to a DDR DRAM device (in a rank), and disable a data path connected to a different DDR DRAM device (in a different rank), to cause the respective n-bit section of the read data to be sent to the data signal lines from the module data lines coupled to the DDR DRAM device along the activated data path and not sent from the different DDR DRAM device along the disabled data path"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4:8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65</p> <p>U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>U.S. Patent No. 8,516,185, File History, 2012-06-21 Amendment and Request for Reconsideration after Non-Final Rejection at 7-9</p> <p>U.S. Patent No. 8,516,185, File History, 2012-09-13 Office Action at 4-5, 11-13</p> <p>U.S. Patent No. 8,516,185, File History, 2013-03-13 Amendment and Request for Reconsideration after Non-Final Rejection at 10-13</p> <p>U.S. Patent No. 8,516,185, File History, 2013-07-11 Notice of Allowance at 2-4</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>U.S. Patent No. 8,417,870, File History, 2013-02-02 Notice of Allowance at 7-9</p> <p>U.S. Patent No. 9,606,907, File History, 2015-11-23 Office Action at 5-6</p> <p>U.S. Patent No. 9,606,907, File History, 2016-10-06 Office Action at 2-5, 7</p> <p>U.S. Patent No. 9,606,907, File History, 2016-11-03 Amendment at 29-34</p> <p>U.S. Patent No. 9,606,907, File History, 2017-02-23 Corrected Notice of Allowability at 2-3</p> <p>IPR2014-01029, Paper 10 (POPR) at 4-6</p> <p>IPR2014-01029, Paper 11 (Institution Decision) at 2-3</p> <p>IPR2014-01369, Paper 11 (POPR) at 5-6, 19, 35-41.</p> <p>IPR2014-01369, Paper 12 (Institution Decision) at 2-4, 6-8</p> <p>IPR2017-00577, Paper 6 (POPR) at 2-6, 9-11, 13-17, 18-47, 50-65</p> <p>IPR2017-00577, Paper 8 (Institution Decision) at 3-4, 9-10</p> <p>IPR2017-00577, Paper 26 (Final Written Decision) at 3-4, 14-16</p> <p><i>Netlist, Inc v. Smart Modular Technologies, Inc.</i>, No. 4:13-cv-05889-YGR, Dkt. No. 253 at 11-12, 15-16 (N.D. Cal. Aug. 27, 2014)</p> <p><i>Netlist, Inc, v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 117, Exhibit A at 8-14, 20-40 (C.D. Cal. May 19, 2017)</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p><i>Netlist, Inc. v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 124 at 6-11 (C.D. Cal. May 26, 2017)</p> <p><i>Netlist, Inc. v. SK Hynix Inc. et al</i>, No. 8:16-cv-01605-JLS-JCG, Dkt. No. 143 at 2-9 (C.D. Cal. June 30, 2017)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Nov. 14, 2017 Initial Determination at 116-121 (USITC filed Sept. 1, 2016)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof, and Products Containing the Same</i>, Inv. No. 337-TA-1023, Jan. 16, 2018 Commission Review at 1-2 (USITC filed Sept. 1, 2016)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Nov. 22, 2019 Complainant Netlist, Inc.'s Omnibus Response to Respondents' and Staff's Petitions for Review at 29-33 (USITC filed Oct. 31, 2017)</p> <p><i>In the Matter of Certain Memory Modules and Components Thereof</i>, Inv. No. 337-TA-1089, Apr. 21, 2020 Commission Opinion at 7-13 (USITC filed Oct. 31, 2017)</p> <p>Collins English Dictionary, Seventh Edition, at 16 (2005)</p> <p>The New Oxford American Dictionary, Second Edition, at 15-16 (2005)</p> <p>Newton's Telecom Dictionary, 24th Edition, at 180-81, 263 (2008)</p> <p>McGraw-Hill Dictionary of Scientific and Technical Terms, Sixth Edition, at 294 (2003)</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>Dictionary of Computing, Fifth Edition, at 92, 94 (2004)</p> <p>Wiley Electrical and Electronics Engineering Dictionary, at 212, 256 (2004)</p> <p>A Dictionary of Computing, Fifth Edition, at 179 (2004)</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 1	<p>"a module controller . . . configurable to receive from the memory controller via the address and control signal lines input address and control signals for a memory write operation to write N-bit-wide write data from the memory controller into a first N- bit-wide rank of the multiple N-bit-wide ranks, and to output registered address and control signals</p>	<p>"a control circuit configurable to receive from the memory controller via the address and control signal lines input address and control signals for a memory write operation to write N-bit-wide write data from the memory controller into a first N-bit-wide rank of the multiple N-bit-wide ranks and corresponding to a number of ranks of memory devices lower than the physical number of ranks of memory devices on the module, and in response to receiving the input address and control signals, to output registered address and control signals corresponding to the number of physical ranks of memory devices on the module, wherein the registered address and control signals cause the first N-bit-wide rank to perform the memory write operation by receiving the N-bit-wide write data, wherein the module controller is further configurable to output module control signals in response to at least some of the input address and control signals"</p> <p><b><u>Intrinsic Evidence:</u></b></p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
	<p>in response to receiving the input address and control signals, wherein the registered address and control signals cause the first N-bit-wide rank to perform the memory write operation by receiving the N-bit-wide write data, wherein the module controller is further configurable to output module control signals in response to at least some of the input address and control signals”</p>	<p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-2:23, 2:26-61, 3:23-28, 4:15-47, 4:48-5:3, 5:4-23, 5:24-43, 5:44-64, 5:65-6:16, 6:17-64, 7:44-49, 8:16-53, 10:17-53, 10:54-11:44, 14:59-15:25, 15:61-16:64, 17:14-44; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-8; 2:46-3:30, 5:11-50, 6:63-8:22, 10:56-12:40, 19:59-22:29, 22:30-23:43; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 9-12; 2:62-3:34, 4:55-5:13, 15:7-25, 16:19-44, 21:55-24:40, 31:1-34:3; claims 1-44</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>U.S. Patent No. 9,318,160 at 18:33-39, 22:19-42.</p> <p>U.S. Patent No. 8,787,060 at 18:45-51, 22:34-57.</p> <p>U.S. Patent No. 10,902,886 at 18:67-19:9, 22:57-23:15.</p> <p>The Dictionary of Multimedia Terms &amp; Acronyms, Fourth Edition, at 94 (2005)</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 11	<p>"a module controller . . . configurable to receive from the memory controller via the address and control signal lines input address and control signals for a memory write operation to write N-bit-wide write data from the memory controller into a first N- bit-wide rank among the multiple N-bit-wide ranks, and to output registered address and control signals in response to the input address and control signal, wherein the registered address and control signals cause the</p>	<p>"a control circuit configurable to receive from the memory controller via the address and control signal lines input address and control signals for a memory write operation to write N-bit-wide write data from the memory controller into a first N-bit-wide rank among the multiple N-bit-wide ranks and corresponding to a number of ranks of memory devices lower than the physical number of ranks of memory devices on the module, and in response to the input address and control signals, to output registered address and control signals corresponding to the number of physical ranks of memory devices on the module, wherein the registered address and control signals cause the first N-bit-wide rank to perform the memory write operation by receiving the N-bit-wide write data, wherein the module controller is further configurable to transmit module control signals to the n/2 data transmission circuits in response to the input address and control signals"</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-2:23, 2:26-61, 3:23-28, 4:15-47, 4:48-5:3, 5:4-23, 5:24-43, 5:44-64, 5:65-6:16, 6:17-64, 7:44-49, 8:16-53, 10:17-53, 10:54-11:44, 14:59-15:25, 15:61-16:64, 17:14-44; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
	first N-bit-wide rank to perform the memory write operation by receiving the N-bit-wide write data, wherein the module controller is further configurable to transmit module control signals to the n/2 data transmission circuits in response to the input address and control signals”	<p>Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-8; 2:46-3:30, 5:11-50, 6:63-8:22, 10:56-12:40, 19:59-22:29, 22:30-23:43; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 9-12; 2:62-3:34, 4:55-5:13, 15:7-25, 16:19-44, 21:55-24:40, 31:1-34:3; claims 1-44</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>U.S. Patent No. 9,318,160 at 18:33-39, 22:19-42.</p> <p>U.S. Patent No. 8,787,060 at 18:45-51, 22:34-57.</p> <p>U.S. Patent No. 10,902,886 at 18:67-19:9, 22:57-23:15.</p> <p>The Dictionary of Multimedia Terms &amp; Acronyms, Fourth Edition, at 94 (2005)</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 19	<p>"a module controller . . . configurable to receive from the memory controller via the address and control signal lines first address and control signals for a first memory operation to read first N-bit-wide data from a first N-bit-wide rank among the multiple ranks and to subsequently receive second address and control signals for a second memory operation to read second N-bit-wide data from a second N-bit-wide rank among the multiple ranks, the module controller being further configurable to output first registered address and control signals for the first memory operation in response to receiving the</p>	<p>"a control circuit configurable to receive from the memory controller via the address and control signal lines first address and control signals for a first memory operation to read first N-bit-wide data from a first N-bit-wide rank among the multiple ranks and corresponding to a number of ranks of memory devices lower than the physical number of ranks of memory devices on the module, and to subsequently receive second address and control signals for a second memory operation to read second N-bit-wide data from a second N-bit-wide rank among the multiple ranks and corresponding to a number of ranks of memory devices lower than the physical number of ranks of memory devices on the module, and in response to receiving the first address and control signals, to output first registered address and control signals for the first memory operation corresponding to the number of physical ranks of memory devices on the module, and in response to receiving the second address and control signals, to output second registered address and control signals for the second memory operation corresponding to the number of physical ranks of memory devices on the module, wherein the first registered address and control signals cause the first N-bit-wide rank to output the first N-bit-wide data associated with the first memory operation, and the second registered address and control signals cause the second N-bit-wide rank to output the second N-bit-wide data associated with the second memory operation, wherein the module controller is further configurable to output first module control signals for the first memory operation in response to receiving the first address and control signals and to output second module control signals for the second memory operation in response to receiving the second address and control signals"</p> <p><b><u>Intrinsic Evidence:</u></b></p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
	first address and control signals and to output second registered address and control signals for the second memory operation in response to receiving the second address and control signals, wherein the first registered address and control signals cause the first N-bit-wide rank to output the first N-bit-wide data associated with the first memory operation, and the second registered address and control signals cause the second N-bit-wide rank to output the second N-bit-wide data associated with the second memory operation, wherein the module controller is further configurable to output first module control signals for the first memory operation in response to receiving the first address and control signals and to output second module control	<p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-2:23, 2:26-61, 3:23-28, 4:15-47, 4:48-5:3, 5:4-23, 5:24-43, 5:44-64, 5:65-6:16, 6:17-64, 7:44-49, 8:16-53, 10:17-53, 10:54-11:44, 14:59-15:25, 15:61-16:64, 17:14-44; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-8; 2:46-3:30, 5:11-50, 6:63-8:22, 10:56-12:40, 19:59-22:29, 22:30-23:43; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 9-12; 2:62-3:34, 4:55-5:13, 15:7-25, 16:19-44, 21:55-24:40, 31:1-34:3; claims 1-44</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>U.S. Patent No. 9,318,160 at 18:33-39, 22:19-42</p> <p>U.S. Patent No. 8,787,060 at 18:45-51, 22:34-57</p> <p>U.S. Patent No. 10,902,886 at 18:67-19:9, 22:57-23:15</p> <p>The Dictionary of Multimedia Terms &amp; Acronyms, Fourth Edition, at 94 (2005)</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
	signals for the second memory operation in response to receiving the second address and control signals”	<p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 27	“a module controller . . . configurable to receive from the memory controller via the address and control signal lines first address and control signals for a memory write operation and to subsequently receive second address and control signals for a memory read operation, the module controller being further configurable to output first registered address and control signals and first module control signals for the memory write operation in response to the	<p>“a control circuit configurable to receive from the memory controller via the address and control signal lines first address and control signals for a memory write operation corresponding to a number of ranks of memory devices lower than the physical number of ranks of memory devices on the module, and to subsequently receive second address and control signals for a memory read operation corresponding to a number of ranks of memory devices lower than the physical number of ranks of memory devices on the module, and in response to the first address and control signals, to output for the memory write operation first module control signals and first registered address and control signals corresponding to the number of physical ranks of memory devices on the module, and in response to the second address and control signals, to output for the memory read operation second module control signals and second registered address and control signals corresponding to the number of physical ranks of memory devices on the module”</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-2:23, 2:26-61, 3:23-28, 4:15-47, 4:48-5:3, 5:4-23, 5:24-43, 5:44-64, 5:65-6:16, 6:17-64, 7:44-49, 8:16-53, 10:17-53, 10:54-11:44, 14:59-15:25, 15:61-16:64, 17:14-44; claims 1-35</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
	first address and control signals, and to output second registered address and control signals and second module control signals for the memory read operation in response to the second address and control signals”	<p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-8; 2:46-3:30, 5:11-50, 6:63-8:22, 10:56-12:40, 19:59-22:29, 22:30-23:43; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 9-12; 2:62-3:34, 4:55-5:13, 15:7-25, 16:19-44, 21:55-24:40, 31:1-34:3; claims 1-44</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>U.S. Patent No. 9,318,160 at 18:33-39, 22:19-42</p> <p>U.S. Patent No. 8,787,060 at 18:45-51, 22:34-57</p> <p>U.S. Patent No. 10,902,886 at 18:67-19:9, 22:57-23:15</p> <p>The Dictionary of Multimedia Terms &amp; Acronyms, Fourth Edition, at 94 (2005)</p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 34	<p>"wherein the first set of tristate buffers are enabled for the first time period in accordance with a latency parameter"</p>	<p>Plain and ordinary meaning.</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4:8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p> <p>U.S. Patent No. 10,949,339 File History, 2017-03-27 Application, 2017-10-06 Non-Final Rejection, 2018-04-06 Amendment and Request for Reconsideration After Non-Final Rejection, 2018-07-27 Final Rejection, 2019-07-29 Amendment and Request for Continued Examination, 2019-10-03 Non-Final Rejection, 2020-03-25 Amendment and Request for Reconsideration After Non-Final Rejection, 2020-04-24 Final Rejection, 2020-06-24 Response After Final Action, 2020-07-14 After Final Consideration Program Decision, 2020-07-24 Amendment and Request for Continued Examination, 2020-07-29 Examiner Interview Summary Record, 2020-11-16 Notice of Allowance, 2020-12-17 Amendment After Notice of Allowance, 2021-01-21 Notice of Allowance and Response to Amendment</p> <p>U.S. Patent No. 9,606,907 at 2:25-3:20; claims 1-65</p>

Claim(s)	Terms for Construction	Samsung's Proposed Construction
		<p>U.S. Patent No. 8,417,870 at Abstract; Figs. 1-5; 1:50-57, 2:19-3:8, 3:17-4:44, 4:58-64, 5:25-59, 6:39-7:19, 7:20-8:36, 8:37-9:4, 9:5-37, 9:38-57; claims 1-20</p> <p>U.S. Patent No. 7,289,386 at Abstract; Figs. 1-7; 3:17-30, 23:24-34, 24:57-26:19, 27:21-28:17, 30:47-32:50; claims 1-13</p> <p>U.S. Patent No. 7,532,537 at Abstract; Figs. 3A-11; 2:62-3:35, 4:55-5:2, 5:59-9:18, 13:4-14:36, 17:8-18:50, 33:51-61, 35:4-65, 38:25-40:26, claims 1-44</p> <p><b><u>Extrinsic Evidence:</u></b></p> <p>Defendants may rely on testimony of Dr. Liu and/or Dr. Min to explain the technology, the state of the art at the time the applications leading to the '506 and '339 patents were filed, the level of ordinary skill in the relevant art, and the meaning of this claim element to a person of ordinary skill in the art at the time of the alleged invention, including whether a person of ordinary skill in the art could discern the boundaries of this claim element with reasonable certainty.</p> <p>Defendants may also rely on Dr. Liu and/or Dr. Min to respond to Netlist's claim construction positions and any testimony of Netlist's expert(s) and witnesses.</p>
'339: 35	"wherein the second set of tristate buffers are enabled for the second time period in accordance with a latency parameter"	<p>Plain and ordinary meaning.</p> <p><b><u>Intrinsic Evidence:</u></b></p> <p>U.S. Patent No. 10,949,339 at Abstract; Figs. 1-6; 1:18-51, 1:52-2:4, 2:5-23, 2:26-61, 2:62-3:22, 3:23-28, 3:51-4-8, 4:15-47, 4:48-5:3, 5:4-22, 5:23-43, 5:44-64, 5:65-6:16, 6:17-41, 6:42-64, 6:65-7:14, 7:15-43, 7:44-8:53, 9:27-43, 10:54-11:44, 11:45-12:14, 13:31-53, 13:54-14:14, 14:15-33, 14:34-58, 14:59-15:25, 15:26-40, 15:41-60, 15:61-16:6, 16:7-25, 16:26-44, 16:45-64, 16:65-17:14, 17:15-44, 17:44-18:24, 18:25-65; claims 1-35</p>

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